

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

STATE OF RHODE ISLAND, et al.,

Plaintiffs,

v.

DONALD J. TRUMP, et al.,

Defendants.

C.A. No.:

SUPPLEMENTAL DECLARATION OF DEBRA GARCIA Y GRIEGO

Pursuant to 28 U.S.C. § 1746, I, Debra Garcia y Griego, hereby declare as follows:

1. I am providing this declaration to supplement the information I provided in my declaration dated March 31, 2025.

2. On March 31, 2025, I received the email below from the Institute of Museum and Library Services advising that all of its staff members were going to be placed on administrative leave effective immediately.

From: Teresa A. DeVoe <TDevoe@imls.gov>
Sent: Monday, March 31, 2025 12:39 PM
To: Teresa A. DeVoe <TDevoe@imls.gov>
Cc: Dennis Nangle <DNangle@imls.gov>; Madison Bolls <MBolls@imls.gov>; Cindy Boyden <CBoyden@IMLS.gov>; Laura McKenzie <LMcKenzie@imls.gov>
Subject: [EXTERNAL] all IMLS staff going on administrative leave today

CAUTION: This email originated outside of our organization. Exercise caution prior to clicking on links or opening attachments.

TO: Chief Officers and LSTA Coordinators

Within the last hour IMLS received word that all staff are going to be placed on administrative leave, effective today. We will not be able to work or respond to your emails, and we don't have any information about future timelines related to this action.

Please share with other staff as appropriate, and please know how much we appreciate you and your work.

Teri DeVoe
Associate Deputy Director, Grants to States
Institute of Museum and Library Services
955 L'Enfant Plaza North, SW, Suite 4000
Washington, D.C. 20024
P: 202-653-4778
[Website](#) | [LinkedIn](#) | [Facebook](#)

3. On March 31, 2025, I also received the below statement from AFGE Local 3403 on the status of Museum and Library Services, advising that “[t]he status of previously awarded grants is unclear. Without staff to administer the programs, it is likely that most grants will be terminated.”



A Statement from AFGE Local 3403 on the Status of the Institute of Museum and Library Services

Earlier today, the Institute of Museum and Library Services notified the entire staff that they are being placed on administrative leave immediately. The notification followed a brief meeting between DOGE staff and IMLS leadership. Employees were required to turn in all government property prior to exiting the building, and email accounts are being disabled today. Museums and libraries will no longer be able to contact IMLS staff for updates about the funding they rely upon.

In the absence of staff, all work processing 2025 applications has ended. The status of previously awarded grants is unclear. Without staff to administer the programs, it is likely that most grants will be terminated.

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4. Because there is no staff to administer the Grants to States program, it is unlikely that New Mexico will receive the remainder of its 2024 Grants to States Award by September 30, 2025, as expected, which will cause immediate and irreparable harm to New Mexico.

5. On March 31, 2025, I received notice from my Accounts Receivable/Federal Manager that our reimbursement request approved by IMLS on March 21 had still not been received. As of April 2, 2025, it has still not been received. The eGMS Reach online system through which our reimbursements are processed displays a notice that processing times may be impacted by the Executive Order, however no IMLS staff are available to answer questions about the status and timeline of reimbursement request already approved, and no alternate contact has been provided to answer questions.

Welcome to eGMS Reach

Recent executive orders may impact IMLS response and processing times. At this time, you may continue to submit payment requests and required reports for your open awards. We appreciate your patience.

I declare under penalty of perjury under the laws of the United States that, to the best of my knowledge, the foregoing is true and correct. Executed on April 3, 2025, at Santa Fe, New Mexico.



DECLARANT
SECRETARY DEBRA GARCIA Y GRIEGO
DEPARTMENT OF CULTURAL AFFAIRS